

From: Edmundson Jim and Ellen [edmundson_elf@yahoo.com]
Sent: Thursday, November 15, 2007 12:51 PM
To: Darton, Terry
Cc: Mary Harris; Roger Waud
Subject: Fwd: Comments on the VDEQ's proposed permit for Mirant's PRGS
To: Mr. Terry Dalton
Air Permit Manager
Virginia Department of Environmental Quality (VDEQ)

From: Jim & Ellen Edmundson
Alexandria Citizens

Dear Mr. Dalton:

We strongly support the annexed comments of our next door neighbor, Roger Waud, especially Paragraph 6 thereof. As 12th floor (14th from ground level) long term (13 years) owner residents, we too "regularly experience inexplicable coughing and sneezing since the [Mirant] plant started using trona, and [for decades before, we] have never had any allergies." Mr. Waud is right: "The permit should not allow the use of trona without a [New Source Review] analysis..." with particular focus on the trona's public health implications.

I [Mr. Edmundson] have lived in Marina Towers since May 1989, served in numerous capacities in the Association, including President (2003-04), testified about Mirant before the City Planning Board and City Council, and attended citizen and governmental meetings on how to cope with Alexandria's most offensive industry. The truth is Mirant is the 800 pound gorilla and without government intervention, we are simply at Mirant's mercy, an attribute of which it is sorely lacking. Please help us by requiring Mirant to implement a comprehensive permit. Thank you.

Respectfull submitted,

Jim & Ellen Edmundson
501 Slaters Lane
#1201
Alexandria, VA 22314
703-683-6370

Note: forwarded message attached.

-----Original Message-----

From: Roger Waud [mailto:waudr@comcast.net]

Sent: Thursday, November 15, 2007 11:39 AM

To: Roger Waud

Subject: Comments on the VDEQ's proposed permit for Mirant's PRGS

Dear NOTICE member,

FYI: comments (due by November 19) emailed to Terry Darton, Permit Manager, VDEQ, on VDEQ's proposed operating permit for the Mirant plant.

To: Mr. Terry Darton

Air Permit Manager

Virginia Department of Environmental Quality (VDEQ)

<thdarton@deq.virginia.gov>

From: Roger Waud

Alexandria Citizen

Dear Mr. Darton,

Here I submit my comments on the VDEQ's proposed permit for Mirant's PRGS (Potomac River Generating Station), the subject of VDEQ's hearing in Alexandria this November 19th.

1. The permit as written allows PM2.5 (particulate matter) accedence of NAQS (National Ambient Air Quality Standards) and doesn't sufficiently protect public health. The permit uses PM10 as a surrogate for PM2.5. There is no reason not to include a PM2.5 limit instead of using PM10. In Maryland, just across the river from the PRGS, power plants are required to use a PM2.5 limit that meets NAQS. Why should we be less protective of public health than they are, particularly given that the PRGS is located smack in the middle of a dense residential area? PRGS is one of the very few power plants in the United States so situated.

2. There is a state limit on PM2.5 but it is not in SIP (State Implementation Plan). Why not?

3. PM2.5 studies have repeatedly said that annual limits should be set lower.

3. ESP's (Electrostatic Precipitators) are not good at reducing PM2.5. Bag houses do a better job. The waste facility on Eisenhower Avenue here in Alexandria demonstrates this. The permit should require the PRGS to install bag houses.

4. The control technology the PRGS already has is not being used to the fullest extent possible. The permit should require that the plant use its existing controls to control emissions better.

5. With the ongoing and proposed changes at PRGS why has NSR (New Source Review) not been triggered? DEQ said a year ago that they would require an NSR, but it hasn't happened. Why not?

6. It is not scientifically proven that trona reduces PM emissions. Moreover the health impacts of Trona are not known. I live next to the plant and I regularly experience inexplicable coughing and sneezing since the plant started using trona, and I have never had any allergies. The permit should not allow the use of trona without an NSR analysis, both of its effectiveness at reducing PM emissions and its public health implications.

7. The permit should require the use of CEMS (continuous emission monitoring systems). CEMS have been used in Europe for 20 years. Currently CEMS are used in 6 locations in the U. S. and there are places where they are required by permit. Especially because of the location of the PRGS in a dense residential area, the permit should require the plant to use CEMS. There's no excuse for the permit not to require use of CEMS.

8. I agree with the City of Alexandria's comments on and critique of this permit. We need a comprehensive permit -- this permit doesn't do it.

Sincerely,

Roger Waud
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